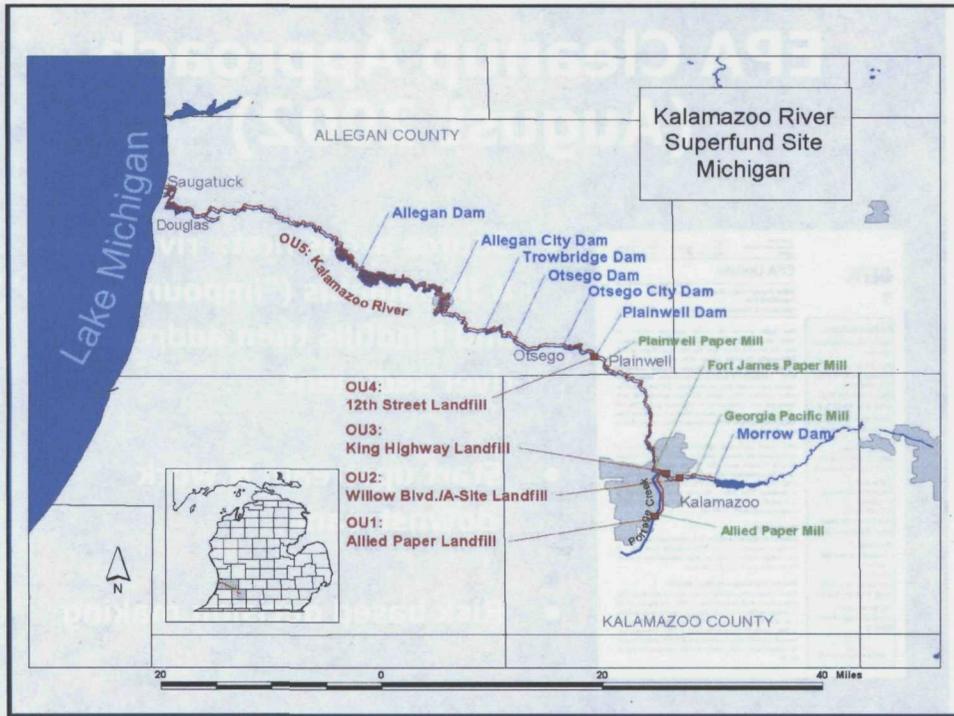
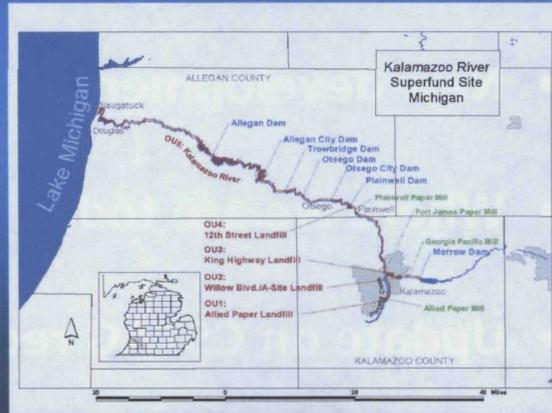




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# Allied Paper/Portage Creek/Kalamazoo River Superfund Site

**CSTAG Update**  
October 12, 2004



# Overview

- EPA cleanup approach - 2002
- New developments - 2003
- Where we are today – 2004
- Update on CSTAG recommendations

## EPA Cleanup Approach (August 2002)

**EPA Update**  
**Missed Power/Portage Creek/Kickapoo River Superfund Site**  
 Kalamazoo & Allegan County, Michigan August 2002

**For More Information...**  
 Please contact any team member below:  
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 Visit the website at:  
 www.epa.gov/superfund/superfund

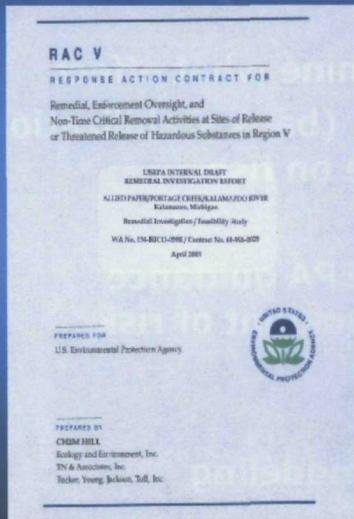
**Summary**  
 This update provides the overall plan and schedule for future site cleanup activities. Note that the management has been transferred from the State of Michigan to U.S. Environmental Protection Agency. EPA's cleanup plan for the Kickapoo River is to first eliminate ongoing sources of PCBs - polychlorinated biphenyl - contaminants, which include regional paper mills along the river bank, and then address in-stream sediments. EPA's cleanup will begin upstream and work downstream and it includes work at downstream sites. EPA will address the River's pollution from a Downstream Tributary Lake (Algonquin) last and then the Power 2 portion (Lake Michigan).

**Missed Lake**  
 EPA is evaluating cleanup options for in-stream sediments. EPA is also conducting ongoing research of PCBs in Marine Lake. EPA will also evaluate existing landfills and paper mill properties to ensure they are not a source of PCBs to the river.

**Portage and Onaga City Impairments**  
 EPA will issue a Remedial Plan for the Portage and Onaga City Impairments in the spring/summer of 2003. The Onaga for the 77th and 82nd streets of the Remedial Plan is scheduled for the study work. The Onaga remedial 2002, the 81st Report in the winter of 2002, and the 75 Report in the spring of 2002. EPA expects to issue the Onaga Remedial Plan in the summer of 2003. Depending upon the selected water table, volume of public, customer received on the 77.

- Source areas first: riverbanks & floodplains ("impoundments") and landfills then address river sediment
- Start upstream & work downstream
- Risk based decision making

# EPA Draft RI/FS (June 2003)



Otsego City



Plainwell

# Developments (Fall/Winter 2003)

## State & environmental groups want:

- Dams removed
- Free run of river
- Paper waste dug up & removed off-site
- State disagrees with approach (sources 1<sup>st</sup>)



### The Kalamazoo River Dams: Questions and Answers

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Kalamazoo, Michigan September 2003

#### For more information...

**Site in Focus**  
Community Development  
210000-0100  
900-421-8111 Ext. 4430  
800-421-8111

#### Site related documents may be reviewed at:

- Kalamazoo Public Library  
715 South Rose  
Kalamazoo, MI 49001
- Windsor Library  
Windsor Michigan 48090  
202 West Michigan Avenue  
Kalamazoo, MI 49001
- Charlevoix Public Library  
101 South Waterford  
Charlevoix, MI 49716
- Algebra Public Library  
211 North Street  
Algebra, MI 49710
- Orange Public Library  
221 South Waterford Street  
Orange, MI 49757
- Ypsilanti Public Library  
88 Union Street  
Ypsilanti, MI 48197

Other publicly available information is available at the following websites:

The U.S. Environmental Protection Agency has been actively involved in several meetings sponsored by local environmental groups for the Allied Paper Inc./Portage Creek/Kalamazoo River Superfund site. An agenda for a recent meeting is in the form of the attached document. An agenda for a recent meeting is in the form of the attached document. An agenda for a recent meeting is in the form of the attached document.

**Has EPA decided whether the dams should stay in place?**  
The EPA has not made a decision about whether the dams should stay in place or be removed. EPA currently has Michigan Department of Environmental Quality's Remedial Feasibility Study (RFS) as the basis for its proposed removal approach under the Kalamazoo River (Phase 1 and 2) RI/FS. EPA is in the process of reviewing and commenting on the RFS. The RFS includes a list of "alternative ways" which describe how removal alternatives being considered by the RFS are implemented. EPA will eventually select the approach for these alternatives from the alternatives array after it is finalized. Because the RFS and the agency are still deliberating about the RFS, including the alternatives array, it is not yet available to the public. EPA can answer questions that are not the subject of the RFS, but questions for the RFS are addressed to the responsible parties provided in the National "C" and Remedial Investigation/Feasibility Study (RI/FS) as the RFS.

**How does this issue (the dams) fit into Superfund's cleanup plan removal process?**  
To fully understand the importance of this issue, let's first examine the process EPA uses to clean up a Superfund site. The "C" process uses various criteria (EPA's criteria for cleaning up a Superfund site). The first two criteria - called "Removal criteria" - are the most important. If any alternative meets these criteria in order to be eligible for selection. The first two criteria concern removal of hazardous waste and the protection, and the second is compliance with applicable or appropriate and national legal requirements. If an alternative meets the first two criteria, EPA will evaluate the alternative according to the Superfund remedy selection process provided in the National "C" and Remedial Investigation/Feasibility Study (RI/FS) as the RFS.

The next two criteria relate to the cleanup decision process as the "primary" following criteria. After the Remedial Investigation/Feasibility Study (RI/FS) is completed, EPA will evaluate the alternative and determine if it meets the criteria for removal. The first two criteria are:

- Long-term effectiveness and permanence
- Protection of health, safety, or values through treatment
- Short-term effectiveness
- Feasibility
- Cost

## **EPA – RI/FS Issues**

- **Difficult for EPA to determine what effect a source control measure (bank stabilization, removal, etc.) would have on fish.**
- **For each cleanup option, EPA guidance requires quantifying the amount of risk reduction in fish**
- **EPA experts recommend modeling**

## **Where We Are Today**

- **Modeling**
- **Mediated Negotiations**

## Principle 1

Modeling will identify all PCB sources including contributions from:

- upstream (surface water & sediment)
- groundwater from landfills
- riverbanks & floodplains
- groundwater moving thru paper waste
- surface water runoff
- river sediment

## Principle 2

Public involved early and often:

- Quarterly public meetings & superfund workshops
- River model development
  - public modeling workshops & established model review team which includes TAGG
- EPA fact sheet include MDCH web link for fish advisory
- Held Realtor workshop

## Principle 2

### River model development

- public modeling workshops & established model review team which includes TAGG
- EPA fact sheet include MDCH web link for fish advisory
- Held Realtor workshop on brownfields

## Principle 3

### Coordination with State, Natural Resource Trustees, Tribes, & local governments

- Created **Federal Family** (EPA & Federal Trustees) to coordinate unified positions on site restoration issues
- Coordination on **model development**
  - modeling meetings with PRPs, State, Trustees, public
  - community modeling workshop
  - creating modeling review team will include TAGG

## **Principle 3**

### **Mediated Negotiations**

- **Among PRPs, State, EPA, Natural Resource Trustees**
- **Facilitate negotiation between EPA and PRPs for future RI/FS work**
- **Renegotiate State Agreement with PRPs**
- **Facilitate discussions regarding restoration of natural resources including dam removal**

## **Principle 3**

- **Damaged fish advisory signs were repaired. Are understandable and at suitable locations**
- **Renegotiate State Agreement with PRPs**
- **Facilitate discussions regarding restoration of natural resources**

## Principle 3

- Cultural Resource Survey is needed
- Worked with Gun Lake tribe - received SACA grant for work on identifying tribal lands of religious or cultural significance

## Principle 4

- Conceptual site model is now being updated
  - include fate of dams
  - USGS dam study results (12)
- Modeling will identify relative contributions of key PCB sources

## Update - Principle 6

- EPA is evaluating the PRP river modeling results and will use this info. in EPA model to the extent practicable (18)
- Exposure & input paramerts in Human health & Eco risk assesment reports available on CD (19, 20)
- EPA will continue funding USGS to collect ..... Information for modeling effort (21)

## Update - Principle 6

- Region 5 is planning to peer review QEA's hydrodynamic model after first phase of model (22)

## Update - Principle 9

- MDCH web link for fish consumption advisories is included in EPA fact sheets (25)
- Fate of State-owned dams will be discussed during mediation negotiations (26)

## Update - Principle 10

- EPA & Federal Trustees formed group (federal family) to get input on habitat mitigation, restoration, and damage assessments (27)
- River rerouting and on-site placement of waste were evaluated as alternatives in the EPA draft RI/FS for Plainwell & Otsego City impoundments (28, 29)

## **Modeling (cont.)**

- **Meetings with PRPs, State, and Natural Resource Trustees to get input on model development**
- **Held community modeling workshop**
- **QEA started modeling**
  - **3 Phases**
  - **Continuing to Phase 2 and 3 dependant on results of previous phase**

## **Mediated Negotiations**

- **Finalizing mediation agreement**
- **First mediated session - October**

## Other Activities

- EPA public meetings (6/29 & 9/29)
- Workshops
  - Superfund workshop (10/19)
  - Modeling (8/18)
- Georgia Pacific Mill delisting meetings
- Negotiations continuing with PRP for 12<sup>th</sup> street landfill & Plainwell mill cleanup
- Plainwell mill land reuse meetings

## EPA Contacts

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